IPP

INTERMOUNTAIN POWER PROJECT
A DEVELOPMENT OF INTERMOUNTAIN POWER AGENCY

May 26, 1982

Mr. Roger W. Dutton
Black & Veatch Consulting Engineers
P. O. Box 8405
Kansas City, Missouri 64114

Dear Mr. Dutton:

Intermountain Power Project (IPP)
Intermountain Generating Station (IGS)
Fugitive Dust Emissions System Analysis
File No. 9255.42.1206

This letter confirms the information provided to your Mr. Dan Nelson on April 6, 1982 by our Ms. Charlotte J. Welty and Mr. Tim L. Conkin.

The following recommendations concerning the Black & Veatch (B&V) "Fugitive Dust Emissions System Analysis" Preliminary Report were made by Ms. Welty and Mr. Conkin after review of the report.

1. The Department requests that particulate matter (PM) emissions from the IGS chimneys be included in the analysis.

2. The Department requests both the Prevention of Significant Deterioration (PSD) increment standards and the National Ambient Air Quality Standards (NAAQS) be addressed in the analysis. The PSD increment standards are the controlling standards for the IGS, but an explanation of compliance with the NAAQS will make the B&V "Fugitive Dust Emissions System Analysis" more complete.

3. The Department recommends that B&V review the September 23, 1981 report "Workbook on Estimation of Emissions and Dispersion Modeling for Fugitive Particulate Sources" prepared by Environmental Research and Technology, Inc., for more appropriate, EPA-approved, emission factors (EF).

4. The Department requests that nontemporary PM emissions from haul roads be addressed in the analysis.

Project Manager/Department of Water and Power City of Los Angeles
111 North Hope Street, Los Angeles, California/Mailing Address: P.O. Box 111-Room 931 Los Angeles, California 90051

5. The EF used to estimate PM emission impacts from the "Ash Silo Unloading" should be reevaluated. The analysis attributed 22 percent of the IGS 24-hour average impact for PM to "Ash Silo Unloading". The 22 percent contribution would seem too high since the IGS fly ash will be mixed with scrubber sludge to create a mixture which is 25 percent moisture.

6. The Department requests that ash silo vent emission impacts be included in the analysis.

7. The Department requests B&V to analyze the amount of additional acreage required at the north-northeast boundary to prevent violation of the PSD increment standards and NAAQS.

8. The design coal, Coal B, should be used for the "average case" and for the "worst case", a blend of 50 percent Coal B and 50 percent Coal F should be used, since these were the coals used in the boiler design.

9. The analysis estimated a 90 percent control efficiency for PM for the reserve coal storage pile. The control efficiency seems low since the pile will be covered with a sealing agent. The Department requests that B&V clarify this issue.

10. The analysis states the IGS will handle three unit trains per day and 10 million tons of coal per year. The correct values are 2.9 coal trains per day and 8 million tons of coal per year.

11. The Department requests that B&V provide all PM air quality impact concentrations. The 24-hour average air quality fugitive emission impacts for PM by modeling modified coal and the reserve coal storage pile at 2,153,000 tons are not given in the analysis.

12. On Page A-4 (Appendix), Part A, Reserve Coal Storage, there is a mathematical error. The last mathematical operation in Part A should equal 0.00001 g/sec/m^2, not 0.0001 g/sec/m^2.

13. The June 1981 H. E. Cramer Company, Inc., "Calculated Air Quality Impact of Emissions From the IPP Power Plant for the Revised Stack Configuration" discusses that uncontaminated windblown soil background concentrations need not be considered in assessing compliance with the NAAQS. The Department requests B&V to include a discussion on this subject in the analysis.

The Department requests a letter from B&V, prior to proceeding with additional analysis, which will list the Department and other B&V suggested changes to the "Fugitive Dust Emissions System Analysis".

If additional information is desired regarding any of these items, please contact Ms. C. J. Welty at (213) 481-4568.

Sincerely,

JAMES H. ANTHONY
Project Director
Intermountain Power Project

By

JACK M. HAYASHI
Generating Station Project Engineer

CJW:lak

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